

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CHASOM BROWN, et al.,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. [20-cv-03664-LHK](#) (SVK)

**ORDER REGARDING AUGUST 13,
2021 DISCOVERY SUBMISSIONS**

Re: Dkt. Nos. 249, 251

The Court is in receipt of the Parties' supplemental submissions at Dkt. Nos. 249 and 251 and **ORDERS** as follows:

1. In re Dispute P13:

- a. Interrogatory No. 5: Plaintiffs' motion is granted in part. By **August 30, 2021**, Google is to identify the top 25 visited websites for each of Google Analytics and Google Ad Manager. Each Party may search the websites for the requested, public information.
- b. Interrogatory No. 9: Plaintiff's motion is denied. Each case presents unique facts to the Court which informs its discovery orders. Here, all sides will be well aware of the facts supporting or not supporting class certification. There is nothing to be gained by responding to this interrogatory.

2. In re Dispute P21 regarding Mr. Pichai's ESI: By **August 19, 2021**, Plaintiffs are to make a good faith proposal to Google for an expanded time frame and addition of search terms, noting that a search of CEO documents over a 5 year period adding 12 additional terms appears to be overbroad on its face. By **August 24, 2021**, Google is to make a counter proposal with a time frame and search terms. At **noon on August 27, 2021**, if necessary after completion of the requisite robust meet and confer efforts, the Parties may make a

1 joint submission not to exceed 5 pages. The submission must refer to documents that
2 support Plaintiffs' request and reflect each sides' proposals during the meet and confer
3 process.

- 4 **3.** Dispute D3 in re Chrome Settings. By **August 19, 2021**, Google's RFP regarding
5 Plaintiffs' Chrome settings is to be narrowed to identify a reasonable number of specific
6 settings for which Google seeks this information and whether the response may be by
7 verified written response or by production of documents. By **August 24, 2021**, Plaintiffs
8 counter-proposal is due. A blanket response by Plaintiffs regarding privacy is not
9 acceptable in light of the allegations in this case. At **noon on August 27, 2021**, if
10 necessary after completion of the requisite robust meet and confer efforts, the Parties may
11 make a joint submission not to exceed 5 pages. The submission must reflect each sides'
12 proposals. All proposals must reflect and are subject to prior related rulings by this Court.

13 **SO ORDERED.**

14 Dated: August 17, 2021

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17 SUSAN VAN KEULEN
18 United States Magistrate Judge
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